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Attorneys for Plaintiffs Justin Budare  
Mark S. Kornfeld, Tamara Barton,  
Tracy D. Martinez, and Ericsson Broadbent

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE VOLKSWAGEN “CLEAN DIESEL”  
MARKETING, SALES PRACTICES, AND  
PRODUCTS LIABILITY LITIGATION

This Document Relates to:  
  
ALL ACTIONS

CASE NO. 15-md-02672-CRB (JSC)

**RESPONSE OF PLAINTIFF JUSTIN  
BUDARE TO PRETRIAL ORDER NO.  
1 REGARDING APPOINTMENT OF  
SPECIAL SETTLEMENT MASTER**

1 Plaintiffs Justin Budare, Mark S. Kornfeld, Tamara Barton, Tracy D. Martinez, and  
2 Ericsson Broadbent, through their counsel, respectfully submit this response to Pretrial Order  
3 No. 1 (ECF No. 2) regarding appointment of Special Settlement Master.

4 The Court has before it a lengthy slate of qualified and experienced individuals for  
5 consideration of appointment as Special Settlement Master(s). We respectfully submit that in our  
6 experience resolving cases involving complex litigation, four jurists stand out as exceptionally  
7 qualified in terms of their experience, sophistication, and ability to resolve the most complex of  
8 cases: (1) The Honorable Edward A. Infante (Ret.), (2) Chief Magistrate Judge Joseph C. Spero,  
9 (3) The Honorable Vaughn R. Walker (Ret.), and (4) The Honorable Daniel Weinstein (Ret.).  
10 We believe that any or some combination of these four jurists are ably suited to facilitate a just  
11 and expeditious resolution of this matter.  
12

13 Dated: December 21, 2015

Respectfully submitted,

14 **STEYER LOWENTHAL BOODROOKAS**  
15 **ALVAREZ & SMITH LLP**

16 By: /s/ Allan Steyer  
17 Allan Steyer (SBN 100318)

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27 Attorneys for Plaintiffs Justin Budare Mark S.  
28 Kornfeld, Tamara Barton, Tracy D. Martinez,  
and Ericsson Broadbent

1 **CERTIFICATE OF SERVICE**

2 I, Jill M. Manning, declare that I am over the age of eighteen (18) and not a party to the  
3 entitled action. I am a partner in the law firm Steyer Lowenthal Boodrookas Alvarez & Smith  
4 LLP, and my office is located at One California Street, Suite 300, San Francisco, California  
5 94111.

6 On December 21, 2015, I caused to be filed the following:

7 **RESPONSE OF PLAINTIFF JUSTIN BUDARE TO PRETRIAL ORDER NO. 1**  
8 **REGARDING APPOINTMENT OF SPECIAL SETTLEMENT MASTER**

9 with the Clerk of the Court of the United States District Court for the Northern District of  
10 California, using the official Court Electronic Document Filing System which served copies on  
11 all interested parties registered for electronic filing.

12 I declare under penalty of perjury that the foregoing is true and correct.

13 By: /s/ Jill M. Manning  
14 Jill M. Manning